

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Kent Allen

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Vladimer Tenev

(Robinhood)

Baiju Bhatt

(Robinhood)

Rudric Davis

(Gucci Mane)

COMPLAINT

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Kent Allen, is a citizen of the State of
(Plaintiff's name)

Florida
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Vladimir Tener, is a citizen of the State of
(Defendant's name)

California

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Baiju Bhatt, is incorporated under the laws of
the State of California

and has its principal place of business in the State of California

or is incorporated under the laws of (foreign state) —

and has its principal place of business in California

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>Kent</u>	<u>A</u>	<u>Allen</u>
First Name	Middle Initial	Last Name
<u>333 Aylesbury Court</u>		
Street Address		
<u>Kissimmee</u>	<u>FL</u>	<u>34758</u>
County, City	State	Zip Code
<u>404.721.9050</u>	<u>nerdsfinancial@yahoo.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	Vladimir	Tenev
	First Name	Last Name
	CEO	
	Current Job Title (or other identifying information)	
	85 Willow Road	
	Current Work Address (or other address where defendant may be served)	
	Menlo Park	CA 94025
	County, City	State Zip Code
Defendant 2:	Baiju	Bhatt
	First Name	Last Name
	CEO	
	Current Job Title (or other identifying information)	
	85 Willow Road	
	Current Work Address (or other address where defendant may be served)	
	Menlo Park	CA 94025
	County, City	State Zip Code
Defendant 3:	Radric	Davis
	First Name	Last Name
	Recording Artist	
	Current Job Title (or other identifying information)	
	1633 Broadway	
	Current Work Address (or other address where defendant may be served)	
	New York	NY 10019
	County, City	State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: Georgia

Date(s) of occurrence: _____

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Please see attachment

At the age of 10, I was staying in the rural area of Georgia as my mother had moved me to the countryside due to the bullying I had experienced. Sometimes, over the weekend I used to go visit friends that stayed in the countryside. One of my favorite friends to visit was Radric Davis also known as Gucci Mane. When I used to visit him we used to play outside usually running around, playing sports, or doing different chores that the adults used to have us do. Personally, I used to like running as I also was into track and also playing basketball.

As a kid, I was very much into video games and cartoon shows. One of my favorite cartoon shows to watch at the time was Robin Hood. I watched every single show. At the time, the show was aired on television in the early 1990s and later discontinued. It was later relaunched at a later date. While playing outside with Radric I thought about how Robin Hood the cartoon show should also be used for stock trading. At first, he was puzzled at the idea. I explained to him that the name makes me think of stock trading.

My myth was that the theme of the show means that a person steal from the rich and give to the poor. In stock trading, you see this as poor traders look to become enriched. Additionally, stock trading is a zero sum game. At first, he was puzzled by this and I told him that it will work trust me. In the future, once we introduce this to the cartoon creators of Robin Hood they will love it. He simply stated, "okay". As I mentioned he was puzzled by this idea. Years later, he became a famed entertainment artist and put out the idea for the public. Since then the cartoon Robin Hood also has been released as a TV show and movie. Personally, I didn't get to develop Radric as I did with all my artists that I presented ideas too.

Sent from Yahoo Mail for iPhone

Business domains to release to Radric Davis.

- 1) gashouseclub.com——fashion apparel for mens
- 2) sexiswimwear.com——fashion apparel for women

* Please see attachment for how to display logo

- 3) nerdsfinancial.com——can be a stand alone app to process tax returns and/or combined into Robinhood to prepare user tax preparation. Just need to be built into the application. For marketing, advertise about tax season coming and provide users of Robinhood to prepare his/her taxes. This can be built into the app collectively or built into the app then once a user clicks then goes to the website.

Sent from Yahoo Mail for iPhone

When I was 8 years located in Forest Park, Ga I thought of Google because it was a rural area, and seemed off the map. I figured we all needed a way to locate each other. While staying in the area I did make some friends which is OutKast which consist of the artists Big Boi and Andre 3000. Additionally, a few other local kids. Other contact I was in reach with was Mark Zuckerberg whom is my cousin on my mother side named Lisa Knight. These incident happened doing the .com bloomed. At the end of my stay in Forest Park my domain that I carried was Google which was compromised. The following day when the domain needed to be renewed it was purchased. Only a few close friends knew of the idea so I discussed it with each one of them. As I discussed it with each member of OutKast they both said they didn't know anything. A couple days later I did file a police report with Forest Park Police about the incident. This happened years ago so I don't know if they still have the report as its a small rural town. I was told they did figure out who did it and told the party to not renew the domain in a one year period. At the time as a kid I was puzzled and hurt by the idea of how someone would do such a thing.

At 9 yrs old I moved to Decatur, Ga which I helped developed such artists as Bow Wow, Outkast, Ludacris, Lauren London, later on Jeezy and Keyshia Cole. I still had dealings with OutKast because at the time I didn't know for sure whom took the Google domain. I was still waiting on it to become available so I can repurchase it like the police said. Doing this time I started to think of other business domains particularly for my artists. So I composed a list of domains to assign each artist. Once I thought of all the names I assigned them to different artists. At the time I held all the domains and assigned them to each artist. One of the individuals I felt I could trust was OutKast (Big Boi and Andre 3000) for some reason as a kid that just needed friends and still not knowing who held the domain. Both of them seen the list of domains I was assigning as they both was with me for development. This list consisted of Visio, Postmates, Kangeroo, Amazon. There was more but those are the main one other than Google and Instagram now owned by Facebook. I purchased each domain and the same thing happened. At the same time I was also checking to make sure Google domain become available which it didn't. Once the domains become available the next day when I was about to purchase each one the same thing happened as with Google.

At a later time, once all this happened Big Boi of OutKast purchased the domain heymoney.com which was meant to be trading app right in front of me so I was able to figure out which one of my friends was doing this. After that I moved to another area as my mother felt the area wasn't for me because I was being bullied by the local kids. One of the ideas I discussed with all of them is Instagram which was later given to Keyshia Cole. I gave it to her when I was 23 to be released to the public. At the time the idea was for entertainers to be able to stay in reach with each other and also market to the general public. The Nike symbol I explained to her to be used because I had business with Nike as a kid basketball player. When Instagram first was released that was the setup which it has changed over time.

Many of the artists I helped develop in the beginning are against me due to their fame status and are friends without me. Many of them I tried to make contact with to discuss everything but wasn't successful. During the course of this I was made a mockery of on Instagram and also Facebook. Since meeting many of them when we was kids throughout the years my memory became very faded. Partly, due to my mother moving me to different locations growing up. Once, I got older doing high school my mother

become very ill so I had to work to help with bills. After high school her status was the same so I had to work two jobs at times. Later, on at the age 30 my mother passed away which if I was compensated from my ideas I would of covered her medical cost.

Around the age of 26, I started attending college and was able to finish with a bachelors in business and also a MBA degree. I graduated with a 3.5 gpa. Due to my mother illness, work, and completely focusing on college my memory of certain things in my childhood was forgotten which is when I made contact with these people. Due to these individuals status and involvement in business around my home location Pompano Beach, FL I was harassed. Additionally, many jobs I worked at these same individuals are involved in therefore without me knowing I was terminated without cause. Due to the state law of Florida your employer can terminate you without due cause. With this happening I had to become self employed part time as an Accountant using the skills I learned from college. Recently, business is very slow due to COVID and also because of the mockery I incurred on social media on both Instagram and also Facebook. This has caused me to close down my business for now.

I don't look for anyone to face any form of incarnation due to these different incidents. I only look to be compensated and also given credit for my ideas. Each artist is still special to me and unique in their own way. Also just looking to have my personal life back as these individuals have businesses in the different areas I stayed and also visited. With the proceeds I plan on opening different business venues to employ people and looking to display being social responsibility. These businesses I do have the domain for which I will provide if needed. Lastly, each artist do look to me for guidance with their future businesses and also discover problems to help them grasp a competitive advantage. I attached this on the next page.

Sent from Yahoo Mail for iPhone

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

No physical injuries only damages to my
standard of living

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Due to the welfare of Oshkosh employee I feel
the remedy of \$57 million would be fair

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>05-04-21</u>		<u></u>	
Dated		Plaintiff's Signature	
<u>Kent</u>	<u>A</u>	<u>Allen</u>	
First Name	Middle Initial	Last Name	
<u>333 Aylerbury Court</u>			
Street Address			
<u>Kissimmee</u>	<u>FL</u>	<u>34758</u>	
County, City	State	Zip Code	
<u>404.721.9050</u>	<u>newfinancial@yahoo.com</u>		
Telephone Number	Email Address (if available)		

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

